

In the Matter of Schools and Libraries Universal Service Support Mechanism  
CC Docket No. 02-6

I believe that the funding provided through the e-rate process is very important to schools. The funding should continue, but the method of applying needs massive changes. Having to complete a minimum of three forms, possibly five, to receive the funding, the process is out of control.

Under the current paperwork intensive process, schools needing the funds can easily lose their funding by filling out the paperwork incorrectly. I know of many schools that are paying to have the forms completed by someone that is familiar with the process and service terminology. The rule that says if 30% of the service listed on the 471 Form is ineligible service, then all is ineligible, puts many of the districts at risk to lose their funding, if they aren't up on the technology and terminology.

Many times schools are contacted and must reply to questions within 7 days or have their application determined ineligible for service. Spring Break in the school is 9 days long. Christmas break is usually at least 14 days. If they are going to work with schools, shouldn't they be sensitive to these time issues?

The SLD hires many temporary staff during the initial rush to determine funding. Many of these people have very limited knowledge about the process and the product. Erroneous determinations can be made due this inexperience. The school can then appeal the decision, but an appeal can easily be hung-up in the process for over a year.

As e-rate coordinator, I spent hours justifying a phone bill prior to approval of funding. Our estimate was off from actual cost by \$3.40 per phone line. The school had 5 phone lines. The amount adjusted was a total of \$204. The salaries of the SLD person and myself were more than the \$204.

I also have concern regarding the amount of money that is spent to operate a corporation to oversee the distribution of the funds. Could more money be distributed for use by schools if the money went into the e-rate fund pot and not the corporation?

You have a challenging job ahead in trying to evaluate and improve the process; hopefully, it can be made user-friendlier. Having completed the e-rate forms for our resident school districts for four years, I have seen the frustrations of the schools at the thought of beginning the process. Even after this many years, I still find the process intimidating.

Should you need to contact me about my comments, I would welcome the opportunity to comment in more detail. I hope that as you progress through this review, you will visit with some of the people that are actually completing the process for the schools. It's always good to learn from the workers in the trenches.

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